

1 The Honorable Robert S. Lasnik  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

10 ABDIKHADAR JAMA, an individual,  
11 JEES JEES, an individual, and  
12 MOHAMED MOHAMED, an individual,

13 Plaintiffs,

14 v.  
15 GOLDEN GATE AMERICA LLC, a foreign  
16 limited liability company, and EAN  
17 HOLDINGS LLC, ENTERPRISE  
18 HOLDINGS, INC., a foreign corporation, and  
19 VANGUARD AUTOMOTIVE GROUP,  
a foreign business entity d/b/a NATIONAL  
CAR RENTAL, ALAMO RENT A CAR, and  
ENTERPRISE RENT-A-CAR,

20 Defendants.

21  
22 No. 2:16-cv-00611-RSL

JOINT STIPULATION AND  
[PROPOSED] ORDER TO RE-NOTE  
PLAINTIFFS' CLASS CERTIFICATION  
MOTION

23 STIPULATION

24 The parties stipulate as follows by and through their counsel of record:

25 WHEREAS, on May 11, 2017, plaintiffs filed their Motion for Class Certification,  
26 Appointment of Class Counsel, and Appointment of Class Representative (Dkt. 57) (the "Class  
Certification Motion"), with a noting date of June 9, 2017;

27 WHEREAS counsel for EAN Holdings LLC ("EAN Holdings") were not served with  
STIPULATION TO RE-NOTE CLASS CERT MTN

(2:16-cv-611-RSL) - 1  
4817-3357-3961v.1 0106725-000001

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1 the Class Certification Motion because they had not been added to the docket as counsel of  
2 record for EAN Holdings;

3 WHEREAS, on June 1, 2017, EAN Holdings' counsel discovered that plaintiffs had  
4 filed their class certification motion and that EAN Holdings had not been served, and later that  
5 date, EAN Holdings' counsel contacted plaintiffs' counsel to alert them to the issue; and

6 WHEREAS, due to the service issue, the parties have agreed to re-note the Class  
7 Certification Motion for June 23, 2017, and therefore, EAN Holdings' opposition will be due  
8 on June 19, 2017, rather than the current due date of June 5, 2017.

9 NOW, THEREFORE, the parties agree that the current June 9, 2017, noting date for  
10 plaintiffs' Class Certification Motion shall be struck and the motion will be re-noted for June  
11 23, 2017, with the opposition and reply deadlines based on the June 23, 2017, re-noted date.

12 STIPULATED TO this 5th day of June, 2017.

13 DAVIS WRIGHT TREMAINE LLP

14 BADGLEY MULLINS TURNER PLLC

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24 STIPULATION TO RE-NOTE CLASS CERT MTN  
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1 **~~PROPOSED~~ ORDER**

2 Pursuant to the stipulation of the parties, IT IS HEREBY ORDERED that:

3 1. The current June 9, 2017, noting date for plaintiffs' Motion for Class  
4 Certification, Appointment of Class Counsel, and Appointment of Class Representative (Dkt.  
5 57) (the "Class Certification Motion") is stricken; and

6 2. Plaintiffs' Class Certification Motion is re-noted for June 23, 2017, with the  
7 opposition and reply deadlines based on the new noting date.

8 IT IS SO ORDERED.

9 DATED this 8<sup>th</sup> day of June, 2017.

10 

11 Honorable Robert S. Lasnik  
12 United States District Court Judge